

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court  
Southern District of Texas

## UNITED STATES DISTRICT COURT

SEP 11 2018

for the

Southern District of Texas

Clerk of Court

United States of America

v.

Pablo LOPEZ-Elizondo

YOB: 1989

Mexico

Case No.

M-18-1902-M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 10, 2018 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 USC 952(a) &amp; 21 USC 841(a)(1)

Knowingly and intentionally attempt to import into the United States from the United Mexican States approximately 16.34 kilograms of cocaine, a Schedule II controlled substance under the Controlled Substances Act, and did knowingly and intentionally possess with the intent to distribute approximately 16.34 kilograms of cocaine, Schedule II controlled substance under the Controlled Substance Act.

AS-2

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.approved by  
[Signature]

Sworn to before me and signed in my presence.

Date: 09/11/2018City and state: McAllen, Texas

[Signature]

Complainant's signature

Rene Santos, Special Agent

Printed name and title

[Signature]

Judge's signature

J. Scott Hacker, U.S. Magistrate Judge

Printed name and title

## ATTACHMENT A

On September 10, 2018, at approximately 9:34 AM, Pablo LOPEZ-Elizondo applied for admission into the United States at the Pharr, Texas, Port of Entry. Lopez-Elizondo was driving a vehicle with a Mexican license plate and stated that the purpose of his visit was to go shopping. During primary inspection LOPEZ-Elizondo gave a negative declaration for narcotics, currency over ten thousand dollars, weapons and ammunitions to the Customs and Border Protection (CBP) officer. LOPEZ-Elizondo was referred for a secondary inspection where a CBP K-9 alerted to the odor of narcotics in the vehicle. An x-ray scan of the vehicle was conducted which resulted in the discovery of anomalies in the gas tank area. An examination of the gas tank, by the CBP officers, resulted in the discovery of concealed packages which field tested positive for cocaine. A total of 15 brick shaped packages containing approximately 16.34 kilograms of cocaine was located concealed within the gas tank.

Homeland Security Investigations (HSI) Special Agent Rene Santos conducted an interview of LOPEZ-Elizondo. After waiving his Miranda Rights, LOPEZ-Elizondo stated that an unknown man in Reynosa, Mexico had hired him to smuggle illicit things into the United States using his vehicle. LOPEZ -Elizondo stated that a couple of days ago someone contacted him to tell him that they wanted him to smuggle something into the U.S. LOPEZ-Elizondo said that last night he had left his vehicle parked somewhere in Reynosa, Mexico and someone picked up his vehicle to hide the illicit contraband. LOPEZ-Elizondo said that today someone contacted him to tell him that the vehicle was ready, he then picked up his vehicle from where he had left it on the previous night and then drove it directly to the Pharr, Port of Entry, where he was apprehended. LOPEZ- explained that he did not know where they had hidden the contraband in his vehicle. LOPEZ-Elizondo stated that previously, about a month ago, he also had smuggled something into the United States hidden in his vehicle and was paid two thousand five hundred U.S. dollars (2,500.00 USD).